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**From:** Osborne, Russell [Russell.Osborne@dnr.mo.gov]  
**Sent:** 9/16/2020 7:02:11 PM  
**To:** Hanlon, Lisa [Hanlon.Lisa@epa.gov]  
**Subject:** RE: OSWI Rule Questions

Hi Lisa,

1. They are not working with a government entity. They will be accepting waste from local arborists; therefore, a CISWI determination rather than a OSWI.
2. The material will solely be forestry product. The local tree removal services will unload the trees and associated foliage at C2G Resources location.
3. The unloaded Missouri hardwoods will be combusted in a machine called a ROI Carbonator 500. From manufacture specs, the machine is capable of processing 20 tons of wood and wood waste per hour with a 10% conversion to "biochar".

The biochar is pyrolyzed wood and will be sold for use as a soil supplement. The main intention of the operation is to produce the biochar. From what I understand (my understanding of pyrolysis is limited), is although air is being forced into the combustion chamber by a blower, the operating temperature of the combustion, +2500 degrees Fahrenheit, will consume more oxygen than what is available in the unit and up to 10% of the feed stock will be pyrolyzed.

If there is anything I can add to help let me know.

Thanks again for your help with this,  
Russell Osborne

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**From:** Hanlon, Lisa <Hanlon.Lisa@epa.gov>  
**Sent:** Wednesday, September 9, 2020 8:54 AM  
**To:** Osborne, Russell <Russell.Osborne@dnr.mo.gov>  
**Cc:** Modak, Nabanita <Modak.Nabanita@epa.gov>  
**Subject:** RE: OSWI Rule Questions

Hi Russell:

I talked to Nabanita at OAQPS.

1. Is the facility working with a government entity or is it a commercial entity? For instance, we've seen this in the wildfire cleanup in the California wildfire and forestry product which would be government and OSWI.
2. What is the facility combusting? Is it all forestry product?
3. What is the combustion product? Does it have market value?

This would help with the determination for Section 129.

Thanks,  
Lisa H

Lisa Hanlon  
Air Compliance  
U.S. EPA Region 7  
11201 Renner Blvd.  
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913-551-7599

[hanlon.lisa@epa.gov](mailto:hanlon.lisa@epa.gov)

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**From:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>

**Sent:** Thursday, September 03, 2020 11:36 AM

**To:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>

**Subject:** RE: OSWI Rule Questions

Hello Lisa,

I hope all is still well with you. I was checking to see if you had any updates for the C2G CISWI determination.

Thank you for your time,

Russell Osborne

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**From:** Osborne, Russell

**Sent:** Thursday, July 9, 2020 12:53 PM

**To:** 'Hanlon, Lisa' <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>

**Subject:** RE: OSWI Rule Questions

Good afternoon Lisa,

Absolutely! That is perfect. I just wanted to be able to provide an update for the installation if they ask. I appreciate your efforts.

Thank you,

Russell Osborne

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**From:** Hanlon, Lisa

**Sent:** Thursday, July 9, 2020 12:24 PM

**To:** Osborne, Russell

**Cc:** Queiroz, Gustavo

**Subject:** RE: OSWI Rule Questions

Hi Russell:

I checked with HQ and they have received an applicability determination (they think from this company) as well. They are under court order deadline to get the OSWI rule out by end of July, so it will be a couple of weeks before they can get to this. I hope that's okay

Lisa

Lisa Hanlon

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**From:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>

**Sent:** Wednesday, July 08, 2020 11:38 AM

**To:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Cc:** Queiroz, Gustavo <[queiroz.gustavo@epa.gov](mailto:queiroz.gustavo@epa.gov)>  
**Subject:** RE: OSWI Rule Questions

Hi Lisa,

I was curious if you had found out anymore guidance pertaining to the portable air curtain incinerator?

Thank you for your time,  
Russell

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**From:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Sent:** Tuesday, June 23, 2020 2:46 PM  
**To:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>  
**Cc:** Queiroz, Gustavo <[queiroz.gustavo@epa.gov](mailto:queiroz.gustavo@epa.gov)>  
**Subject:** RE: OSWI Rule Questions

Hi Russell:

At first glance, this looks like a CISWI unit to me. Unless it's owned by a municipality or other governmental entity, in which it would be an OSWI unit. I'm double checking with HQ who may have some more insight into this type of combustion just in case I'm missing something.  
Lisa

Lisa Hanlon  
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**From:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>  
**Sent:** Monday, June 22, 2020 6:13 PM  
**To:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Subject:** RE: OSWI Rule Questions

Hi Lisa,

I believe you have previously helped me with a tire pyrolysis question. I hope all is well.

I am now working on a project where the installation is using a ROI Carbonator 500, I have attached a flyer about the equipment for clarity purposes. The proposed process will use 100% clean Missouri hardwood obtained from the installation harvesting themselves as well as receiving materials from local tree service companies. The equipment is to operate at 2500 degrees Fahrenheit. The manufactures claim, at this temperature, although air is forced into the equipment the combustion process is still starved for air. This allows roughly 5% of the feed to undergo pyrolysis. The recovered char will be sold as soil supplement. The installation is proposing to be portable with sites located in Liberty, Springfield, and O' Fallon, Missouri.

I have read through the OSWI rules and understand that ACI's are regulated in §60.2970 - §60.2974. It is my understanding however there may be some guidance out there stating that this process is not considered an ACI. I am

unsure as to how to classify the equipment. I have read the definitions in Subpart E and Subpart CCCC and just want to be sure of myself as this is a unique process.

Thank you for your time,  
Russell Osborne

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**From:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>

**Sent:** Monday, June 22, 2020 7:41 AM

**To:** Cheever, Robert <[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)>; Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>

**Subject:** RE: OSWI Rule Questions

Except that's a typo. My number is 7599, but it's often easier to put it in an email so I get the details straight and can respond without having to ask for more info.

Lisa H

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**From:** Cheever, Robert <[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)>

**Sent:** Monday, June 22, 2020 5:43 AM

**To:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>

**Cc:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>

**Subject:** RE: OSWI Rule Questions

Russell,

Lisa Hanlon at 913-551-7968 or [hanlon.lisa@epa.gov](mailto:hanlon.lisa@epa.gov) is the Region 7 OSWI point of contact.

Bob Cheever

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**From:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>

**Sent:** Friday, June 19, 2020 3:13 PM

**To:** Cheever, Robert <[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)>

**Subject:** OSWI Rule Questions

Hello Mr. Cheever,

My name is Russell Osborne I work for the MDNR Air Pollution Control Program. I had some guidance questions for a project and Kendall told me you could point me in the right direction. I was wanting some clarity on the OSWI rules. Who is the EPA Region 7 contact for OSWI rule questions?

Thank you for your time,

**Russell Osborne, E.I.T.**

Missouri Department of Natural Resources

Air Pollution Control Program

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